

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

3M Company, Plaintiff, vs. Legacy Medical Supplies, LLC., Mark Eckhardt, Carol Ann Korpi, Joseph Nelson, Jeremy Reboulet, And Does 1-10, whose true names are largely unknown, Defendants.	Civil Action No. 20-CV-01371 (ECT/KMM) AFFIDAVIT OF WILLIAM R. SKOLNICK IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL OF RECORD WITHOUT SUBSTITUTION
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STATE OF MINNESOTA)

) S.S.

COUNTY OF HENNEPIN)

I, William R. Skolnick, hereby declare under penalty of perjury as follows:

1. I am an attorney licensed to practice law in the State of Minnesota.
2. I, along with Andrew H. Bardwell, and the firm of Skolnick & Joyce, P.A., presently represent Defendants Jeremy Reboulet and Legacy Medical Supplies, LLC (“Defendants”) in the above-entitled action.
3. I file this affidavit in support of the motion to withdraw filed in the above matter.
4. Defendants retained our firm on July 14, 2020, just hours before the Plaintiff’s motion for a temporary restraining order was scheduled to be heard. Mr. Reboulet, individually and on behalf of Legacy Medical Supplies, LLC, executed

a written retainer agreement with our firm. That retainer agreement imposed certain obligations on Defendants, and expressly provided that if those obligations were not met, the firm would withdraw.

5. Since that time, Defendants have not complied with the terms of the retainer agreement that exists between them and our firm. Accordingly, professional considerations under the Minnesota Rules of Professional Conduct require the termination of the representation between Defendants and Skolnick & Joyce, P.A., including its attorneys: Andrew H. Bardwell and myself.
6. We have informed Mr. Reboulet of the reasons that our firm and its attorneys are required to withdraw from representation in this matter.
7. Copies of the motion to withdraw and this affidavit are being served on Defendants contemporaneous with their filing in this Court.
8. In this affidavit, based on concern for attorney-client confidentiality, I have only broadly addressed the issue that necessitates the withdrawal. I will be present at the hearing on this matter to answer questions the Court may have about the issues necessitating my firm's, and its attorneys', withdrawal from representation of Defendants.
9. We have advised Defendants that they should retain new counsel in this matter.
10. To the best of my knowledge, Defendants have not acted on that advice and have not retained new counsel.
11. We have further advised Defendants of the relevant deadlines in this matter.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: August 17, 2020

Signature: /s/ William R. Skolnick

Signed in Hennepin County, Minnesota